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MEMO ENDORSED

May 6, 2021

VIA ECF

The Honorable Andrew L. Carter, Jr United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

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DATE FILED:	5/7/2021

Re: Thorne v. Argon Technologies, Inc., Case No.: 1:20-cv-09442-ALC

Dear Judge Carter:

We represent defendant Argon Technologies, Inc. ("Defendant") in the above-referenced matter. Together with counsel for plaintiff, Braulio Thorne, we jointly and respectfully move this Court to stay all case deadlines in this action for forty five (45) days, from May 6, 2021 to June 22, 2021.

This requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, the parties will file a stipulation of voluntary dismissal.

Respectfully submitted,

/s/ Timothy J. Straub Timothy J. Straub

cc: All counsel of record (by ECF)

The stay is hereby **GRANTED**. The parties are directed to provide the Court a joint update about how they would like to proceed with the case no later than June 22, 2021.

HON, ANDREW L. CARTER, JR. UNITED STATES DISTRICT JUDGE

Dated: 5/7/2021